

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

MARGARET P. BYERS AND MICHAEL C.  
BYERS, CO-ADMINISTRATORS OF THE  
ESTATE OF CHARLES M. BYERS,  
DECEASED,

Plaintiff,

v.

Case No. 3:23-cv-00801-RCY

CITY OF RICHMOND, CHIPPENHAM &  
JOHNSTON-WILLIS HOSPITALS, INC.,  
STEVEN M. GIBSON, DAVID R. HYDE,  
JR., AND JOHN/JANE DOE SECURITY  
GUARDS (1 - 5),

Defendant.

**JOINT MOTION TO FILE REDACTED CHESTERFIELD COUNTY POLICE  
DEPARTMENT BODY-WORN CAMERA FOOTAGE**

COME NOW Plaintiffs Margaret P. Byers and Micheal C. Byers, Co-Administrators of the Estate of Charles M. Byers, deceased (“Plaintiffs”) and the City of Richmond, Chippenham & Johnston-Willis Hospitals, Inc., Steven M. Gibson, and David R. Hyde, Jr., R.N. (“Defendants”) (collectively, “Parties”), by counsel, and move this Court for leave to file a video exhibit in support of their Joint Motion to Modify the Amended Protective Order for Records for the reasons set forth in their Brief in Support of Joint Motion to File Redacted Chesterfield County Police Department Body-Worn Camera Footage.

**CHIPPENHAM & JOHNSTON-  
WILLIS HOSPITALS, INC. AND  
DAVID R. HYDE, JR.**

By Counsel

/s/

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and David R. Hyde, Jr.*

**C E R T I F I C A T E**

I hereby certify that on the 24<sup>th</sup> day of June, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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and I hereby certify that I have emailed the document to the above.

/s/ \_\_\_\_\_  
Elizabeth O. Papoulakos